## January 31, 2005

Mr. Christopher M. Crane, President and Chief Executive Officer Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNIT 2 - RESPONSE TO NUCLEAR REGULATORY

COMMISSION BULLETIN 2003-02, "LEAKAGE FROM REACTOR PRESSURE

VESSEL LOWER HEAD PENETRATIONS AND REACTOR COOLANT PRESSURE BOUNDARY INTEGRITY" (TAC NO. MC0524)

Dear Mr. Crane:

On August 21, 2003, the U.S. Nuclear Regulatory Commission (NRC) issued NRC Bulletin 2003-02, "Leakage from Reactor Pressure Vessel Lower Head Penetrations and Reactor Coolant Pressure Boundary Integrity," to the industry. This bulletin informed addressees that current methods of inspecting the reactor pressure vessel (RPV) lower heads may need to be supplemented with bare-metal visual inspections in order to detect reactor coolant pressure boundary leakage. The bulletin also requested these addressees to provide the NRC with information related to inspections that have been performed to verify the integrity of the RPV lower head penetrations.

The bulletin requested that addressees provide a description of the RPV lower head penetration inspection program that would be implemented at their respective plants during the next, and subsequent, refueling outages. This description was to include the extent of the inspection, the inspection methods to be used, the qualification standards for the inspection methods, the process used to resolve the source of findings of boric acid deposits or corrosion, the inspection documentation to be generated, and the basis for concluding that their plant satisfied applicable regulatory requirements related to the structural, and leakage integrity of the RPV lower head penetrations.

By letter dated September 22, 2003, (ML032691399), Exelon Generation Company, LLC (Exelon) provided its response to this request. Exelon committed to perform a bare-metal visual examination of the RPV lower head surface, and on 100 percent of all 58 RPV lower head penetrations, during the fall 2003 refueling outage at Braidwood Station (Braidwood), Unit 2. In its same response, Exelon indicated that the extent, and frequency of subsequent visual examinations of the RPV lower head penetrations, beyond the fall 2003 refueling outage, will depend upon the appropriate NRC and industry guidance as well as the standardized EGC Procedure ER-AP-331-1001, "Boric Acid Corrosion Control (BACC) Inspection Locations, Implementation, and Inspection Guidelines." The NRC staff notes that there are a number of ongoing industry, and NRC staff activities related to developing criteria for RPV lower head penetration inspections. The NRC staff expects that the criteria for these inspections will involve periodic bare-metal visual examinations or their equivalent.

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The bulletin also requested that addressees provide a summary of the RPV lower head penetration inspection that was performed at their plants, the extent of the inspection, and the methods used, a description of the as-found condition of the lower head, any findings of relevant indications of through-wall leakage, and a summary of the disposition of any findings of boric acid deposits, and any corrective actions taken as a result of indications found.

By letter dated January 15, 2004, (ML040210555), Exelon provided a summary of its inspection results at Braidwood, Unit 2. Exelon reported it had performed a 360-degree bare-metal visual examination on all 58 RPV lower head penetrations. Exelon did not observe any evidence of RPV lower head penetration leakage.

Based on its review of Exelon's responses to NRC Bulletin 2003-02, the NRC staff finds that Exelon has met the reporting requirements of the bulletin for Braidwood, Unit 2. Accordingly, technical assignment control no. MC0524 is closed for Braidwood, Unit 2.

Sincerely,

/RA/

George F. Dick, Senior Project Manager, Section 2 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

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Based on its review of Exelon's responses to NRC Bulletin 2003-02, the NRC staff finds that Exelon has met the reporting requirements of the bulletin for Braidwood, Unit 2. Accordingly, technical assignment control no. MC0524 is closed for Braidwood, Unit 2.

Sincerely,

/RA/

George F. Dick, Senior Project Manager, Section 2 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

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## Braidwood Station Units 1 and 2

CC:

Regional Administrator, Region III U.S. Nuclear Regulatory Commission 801 Warrenville Road Lisle, IL 60532-4351

Document Control Desk - Licensing Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

Mr. Dwain W. Alexander, Project Manager Westinghouse Electric Corporation Energy Systems Business Unit Post Office Box 355 Pittsburgh, PA 15230

Joseph Gallo Gallo & Ross 1025 Connecticut Ave., NW, Suite 1014 Washington, DC 20036

Ms. Bridget Little Rorem Appleseed Coordinator 117 N. Linden Street Essex, IL 60935

Howard A. Learner Environmental Law and Policy Center of the Midwest 35 East Wacker Dr., Suite 1300 Chicago, IL 60601-2110

U.S. Nuclear Regulatory Commission Braidwood Resident Inspectors Office 35100 S. Rt. 53, Suite 79 Braceville, IL 60407

Ms. Lorraine Creek RR 1, Box 182 Manteno, IL 60950 Illinois Emergency Management Agency Division of Disaster Assistance & Preparedness 110 East Adams Street Springfield, IL 62701-1109

Chairman
Will County Board of Supervisors
Will County Board Courthouse
Joliet, IL 60434

Attorney General 500 S. Second Street Springfield, IL 62701

George L. Edgar Morgan, Lewis and Bockius 1111 Pennsylvania Ave, NW Washington, DC 20004

Braidwood Station Plant Manager Exelon Generation Company, LLC 35100 S. Rt. 53, Suite 84 Braceville, IL 60407-9619

Site Vice President - Braidwood Exelon Generation Company, LLC 35100 S. Rt. 53, Suite 84 Braceville, IL 60407-9619

Senior Vice President, Nuclear Services Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

Vice President of Operations - Mid-West Pressurized Water Reactors Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

Chairman, Ogle County Board Post Office Box 357 Oregon, IL 61061 Regulatory Assurance Manager - Braidwood Exelon Generation Company, LLC 35100 S. Rt. 53, Suite 84 Braceville, IL 60407-9619

Director - Licensing and Regulatory Affairs Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

Associate General Counsel Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

Vice President - Licensing and Regulatory Affairs Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

Manager Licensing - Braidwood, Byron and LaSalle Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555